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Plaintiff Pro Se

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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CENTRAL DISTRICT OF CALIF.
LOS ANGELES
BY 

LAURACK D. BRAY

NO. CV 12-5704 (R2)

Plaintiff,

v.

NOTICE OF RELATED CASES
PURSUANT TO L.R. 83-1.3.1

DEPARTMENT OF JUSTICE, et al.

Defendants.

Pursuant to L.R. 83-1.3.1, Plaintiff believes and hereby submits that this, the above-entitled, case and the case of Yassir Fazaga v. Federal Bureau of Investigation, et al., SACV-00301JST (VBKx), assigned to Judge Cormac J. Carney, appear : (b) To call for determination of the same or substantially related or similar questions of law and fact; or (c) For other reasons would entail substantial duplication of labor if heard by different judges.

The primary “same or substantially related or similar questions of law and fact” are questions of race and religion discrimination exercised against both an African American and an Indian American citizen, with the religion discrimination being directed against the Indian who is a practicing Muslim. Both cases involve unlawful searches or surveillance of Muslims because of their religion, rather than because of suspected criminal conduct. The herein Bray case, if assigned to a different judge, “would entail substantial duplication of labor if heard by different judges” because Judge Carney is now familiar with the federal government’s defenses to the claim, and with the federal government’s counsel, who will likely be the same counsel, and he will probably require less time to reach a decision as to the discrimination issue anyway; and Judge Carney will probably make an earlier determination as to whether the matter should be resolved without a need for trial or not, and regarding the appropriateness of proceeding to discovery and/or summary judgment regarding the race and religious discrimination matters.

I believe that the herein or above-entitled case qualifies for related case transfer to Judge Carney because one of the claims in my complaint involves a charge of federal government illegal search of mail that was sent by an Indian American citizen (with an Arabic name), who is a practicing Muslim, to an African

American lawyer; and that the search was based solely on the fact that the mailer was of the Muslim religious faith and the receiver was African American or Black, without either being suspected of a crime or, alternatively, without there being probable cause of a crime being committed by either one. Furthermore, Judge Carney has also dealt with past cases of federal government misconduct, and therefore , will likely be more familiar with the instances of misconduct that are raised in Plaintiff's herein complaint.

Finally, there are similarities or commonalities among the claims alleged in both the Bray Complaint and the Fazaga v. FBI Complaint; in fact, several claims are the exact same claims (based on different facts), i.e., *Bivens* (v. Six Unknown FBI Agents) Action; violation of the Fourth Amendment to the U.S. Constitution; violation of the Fifth Amendment Equal Protection (component) Clause; violation of 42 U.S.C. sec. 1985(3); violation of the Foreign Intelligence Surveillance Act, 50 U.S.C. sec. 1810; and violation of the Privacy Act, 5 U.S.C. sec. 552. This provides additional justification as to why the herein Bray case should be transferred to Judge Carney as a related case transfer.

July 5, 2012
Date

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